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21 District Counsel

22 IN THE UNITED STATES BANKRUPTCY COURT  
23 EASTERN DISTRICT OF CALIFORNIA  
24 FRESNO DIVISION

25 In re

CASE NO. 17-13797

26 TULARE LOCAL HEALTHCARE  
27 DISTRICT, dba TULARE REGIONAL  
28 MEDICAL CENTER,

Chapter 9

Debtor.

DC NO.: WW-19

Tax ID #: 94-6002897  
Address: 869 N. Cherry Street  
Tulare, CA 93274

Date: N/A

Time: N/A

Place: 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13

Judge: Honorable René Lastreto II

29 APPLICATION FOR EX PARTE ORDER AUTHORIZING FRBP 2004 EXAMINATION  
30 AND PRODUCTION OF DOCUMENTS  
31 (CHASE BANK)

32 TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY  
33 JUDGE:

1 TULARE LOCAL HEALTHCARE DISTRICT, dba TULARE REGIONAL MEDICAL  
2 CENTER ("TRMC" or "Applicant"), Debtor in the above captioned Chapter 9 bankruptcy  
3 proceeding, hereby files this Application for Ex Parte Order compelling Chase Bank, to  
4 produce certain documents for inspection and copying and, if requested, to appear for a  
5 FRBP 2004 Examination.

6  
7 Chase Bank  
8 1079 E. Prosperity Ave.  
Tulare, CA 93274

9 Applicant represents as follows:

10 1. TRMC filed a voluntary Chapter 9 petition on September 30, 2017.

11 2. TRMC has reason to believe that Chase Bank, is in possession of  
12 information needed by TRMC which affects the rights of TRMC as well as the  
13 administration of this bankruptcy estate.

14 3. TRMC believes that the information needed bears upon the acts,  
15 conduct, or assets and liabilities of TRMC.

16 4. The examination will also relate to the operation of the TRMC's business  
17 and the desirability of its continuance, the source of any money or property acquired or  
18 to be acquired by TRMC for purposes of consummating a plan and the consideration  
19 given or offered therefore, and any other matter relevant to the case or to the formation  
20 of a plan.

21 5. Conducting such examination will assist TRMC in protecting its interests  
22 in evaluating any plan that may be advanced and in furthering the administration of this  
23 Chapter 9 proceeding.

24 6. By this Application TRMC requests that it be permitted to compel the  
25 production of documentary evidence in the manner provided in FRBP 9016 followed by  
26 an examination, if requested, of Chase Bank.

27 7. By the requested Order Applicant will proceed to have issued a  
28 Subpoena for Rule 2004 Examination with Production of Documents to be followed by

1 the examination of the witness, if documents are requested, no earlier than 10 days  
2 after the date of issuance of the examination order or subpoena, whichever is later.

3 WHEREFORE, Applicant prays as follows:

4 A. The Court enter Order pursuant to FRBP 2004 authorizing the examination  
5 of Chase Bank;

6 B. The Court enter an Order pursuant to FRBP 2004 authorizing the issuance  
7 of a Subpoena for Rule 2004 Examination with Production of Documents; and

8 C. For such other and further relief as is just and proper.

9 Dated: December 13, 2017

10 WALTER WILHELM LAW GROUP,  
11 a Professional Corporation

12 By: 

13 Riley C. Walter, Attorneys for Debtor,  
14 Tulare Local Healthcare District, dba  
Tulare Regional Medical Center